



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

December 7, 2022

Trevor Orth
Site Decommissioning Director
Three Mile Island Unit 1
PO Box 480
Route 441 South
Middletown, PA 17057

RE: ER Project # 2007PR14307.013 and 2021PR03278.007: NRC: TMI-1 and TMI-2 Decommissioning Projects, Londonderry Township, Dauphin County

Dear Mr. Orth,

We are writing in reference to the decommissioning and associated activities of Three Mile Island Nuclear Station (TMI) - Unit 1 (herein referred to as TMI-1). Specifically, we are writing in response to the TMI-1 Post-Shutdown Decommissioning Activities Report (PSDAR) of April 2019. While we acknowledge that this report was prepared almost three years ago and the Pennsylvania State Historic Preservation Office (PA SHPO) was afforded an opportunity to comment on the proposed action, recent activities associated with TMI-Unit 2 (herein referred to as TMI-2) has afforded an opportunity to reexamine previous consultation for the TMI-1 decommissioning project and consider the larger TMI property as a potentially eligible historic property with significance beyond the 1979 incident. The intent of this letter is to make TMI-1 aware of more recent historic evaluation efforts and encourage participation in the Section 106 process in advance of, or as part of, NRC involvement, if applicable.

As noted in the PSDAR, in 2009, TMI-1 developed a Cultural Resources Protection Plan that provides protocols for ensuring continued stewardship of cultural resources on Three Mile Island during the final operational years of TMI-1 and into the post-operational SAFSTOR period. While the plan addresses unanticipated archaeological discoveries, it does not provide a protocol for addressing previously unidentified above ground historic properties. At the time of the plan's development, TMI as a facility, regardless of the operation and ownership, had not yet reached 50 years in age but noted it would reach the 50-year age consideration during the SAFSTOR period (at the earliest 2024; however, arguments could be made with 2019/2020 to coincide with 50 years from the start of construction activities associated with planning efforts, depending on the area of significance, if present). Regardless, at the time of earlier consultations, the recognized significance (with regards to above-ground historic properties) was confined solely to the event of March 28 through April 4, 1979, which occurred at TMI-2.

In April 2021, TMI-2 initiated its decommissioning project with our office, providing detailed information outlined in phases of the proposed work to occur at the site. As part of these efforts, updated documentation was provided regarding the history of TMI-2 specifically; however, given the detailed site history, age of the built landscape, and lack of overall historic context within which to evaluate TMI in its entirety, PA SHPO requested more information regarding the potential significance of TMI with regards to above ground historic properties (Attachment 1). The history of both facilities is connected, if not operationally than at the very least geographically, and functionally similar. Section 5.1.14 of the PSDAR for TMI-1 notes there has been no request from PA SHPO or other agencies to perform a HABS/HAER of TMI-1; however, "if Exelon becomes aware of a previously unidentified proposal for mitigation of a historic resource at the TMI-1 site, due consideration will be given to the proposal at that time." As such, we would like to encourage

collaboration between TMI-1 and TMI-2 in anticipation of federal action to occur on site in order to fully assess and evaluate the potential significance of the property in its entirety. Consequently, we recommend TMI-1 reach out to TMI-2 to coordinate those efforts.

With regards to archaeological resources, we wanted to take this opportunity to request confirmation that the intention at TMI-1 is still to “avoid ground disturbances during decommissioning” in the areas identified as having high archaeological sensitivity at the northern end of the operational area as identified in the PSDAR.

Thank you for your time and consideration. For questions and/or continued consultation, please contact Emma Diehl at emdiehl@pa.gov.



Emma Diehl
Environmental Review Division Manager

C: Hannah Pell, Energy Solutions
Stacey Imboden, NRC

Enc. Attachment 1



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

November 17, 2022

Hannah Pell
TMI-2 Energy Solutions
121 W Trade Street
Suite 2700
Charlotte PA 282020000

RE: ER Project # 2021PR03278.006, TMI-2 Decommissioning Project, Dauphin County, Pennsylvania, Nuclear Regulatory Commission, Conoy Township, Lancaster County

Dear Ms. Pell,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Above Ground Resources

Identification of Historic Properties – More Information Requested

The purpose of this letter is to clarify the PA SHPO response dated 9/12/2022 with regards to the Identification of Historic Properties, specifically Three Mile Island.

While we understand that this project is limited to TMI-2, it is necessary to assess the property in its entirety due to potential effects. It should be noted that the evaluation in 2010 took place before the property was 50 years of age; consequently, only considering the exceptional significance of the property in relation to the events of March 28, 1979-April 4, 1979. Now that the property has achieved 50 years of age, it is necessary to assess and evaluate other potential areas and/or periods of significance for the historic property, covering the entire time frame in which the plant was constructed and operated.

Potential areas of significance may include (but not be limited to):

- Engineering. What aspects of the construction of the site could be significant? Were any models for use in other places? Is TMI an example of a trend in engineering design?
- Labor History. TMI construction was delayed by worker strikes and environmental concerns being raised. Were any changes physically made to the property to address environmental or labor concerns?
- Social History. What is the significance of the public outreach campaigns that occurred when the plant opened? After the near meltdown?

The TMI-2 Control Room was also identified as a contributing factor to the accident, stating “the control room is huge, with hundreds of alarms, and there are some key indicators placed in locations where the operators cannot see them”; and that “lessons from previous accidents did not result in new, clear instructions being passed on to the operators.” Were corrections to this made at TMI-1? What physically changed in nuclear stations as a result of this incident? Is there any evidence of this at TMI-1?

Additionally, as previously noted, the resource is likely the entire island, and not portions of the built environment. Additional information is needed to clarify the appropriate island-wide boundary, and which resources are contributing and non-contributing. This should include roads, bridges, structures, and buildings. Please note, if the Area of Potential Effects extends beyond the island due to potential visual effects, further exploration of the relationship and potential significance between the plant and those neighboring communities may be necessary.

For questions concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Emma Diehl".

Emma Diehl

Environmental Review Division Manager